

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

)	
In re)	
)	Chapter 7
TAMARA ANN TELLO)	Case No. 06-11856-JMD
)	
Debtor)	
)	
)	
OLGA L. BOGDANOV, CHAPTER 7)	Adversary Proceeding
TRUSTEE OF TAMARA ANN TELLO)	No. 07-1046
)	
Plaintiff)	
v.)	
)	
TAMARA ANN TELLO and)	
T.D. BANKNORTH)	
)	
Defendants)	
)	

PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, as made applicable by Rule 7065 of the Rules of Bankruptcy Procedure, the plaintiff, Olga L. Bogdanov, Chapter 7 Trustee of the above captioned debtor's estate, (the "Trustee"), hereby moves for the entry of a preliminary injunction relating to a certain bank account of the debtor. In support of this Motion, the Trustee relies upon and incorporates herein the Verified Complaint filed concurrently herewith. In further support of this Motion, the Trustee states the following:

1. The Trustee is likely to succeed on the merits of the case because the bank account of the debtor contains funds that constitute property of the estate.
2. The Trustee will suffer irreparable harm if the injunction does not issue because the debtor may liquidate or transfer her interest in the bank accounts.

3. The equities favor the issuance of the injunction because no undue burden is placed upon the debtor by the issuance of this preliminary injunction.

4. The public interest is served by the issuance of the injunction because the Trustee should recover on behalf of the bankruptcy estate funds that constitute property of the estate.

WHEREFORE, the Trustee requests that the Court enter a preliminary injunction: enjoining the defendants from conveying, assigning, transferring, pledging, encumbering, liquidating, receiving or dissipating any funds in the bank account of the debtor at Banknorth.

Respectfully submitted,

OLGA L. BOGDANOV, CHAPTER 7 TRUSTEE
OF THE ESTATE OF TAMARA ANN TELLO,
By her attorneys,

/s/ Olga L. Bogdanov BNH#06338

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Dated: March 13, 2007